

ORIGINAL

FEDERAL MARITIME COMMISSION

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REVOCATION OF OCEAN TRANSPORTATION INTERMEDIARY
LICENSE NO. 017843
WASHINGTON MOVERS, INC.
FMC 15-10

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WEDNESDAY, NOVEMBER 9, 2016

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The Hearing of the Federal Maritime
Commission convened in the First Floor Hearing
Room, 800 North Capitol Street, N.W., Washington,
D.C., pursuant to notice at 2:00 p.m., JUDGE CLAY
G. GUTHRIDGE, presiding.

PRESENT:

On behalf of Complainant:

PETER J. KING, DIRECTOR
BRIAN L. TROIANO, DEPUTY DIRECTOR
BRENDA DOTY, ESQUIRE
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Federal Maritime Commission
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On behalf of Respondent:

GEORGE R.A. DOUMAR, ESQUIRE
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1 P R O C E E D I N G S

2 JUDGE GUTHRIDGE: This is the matter
3 Revocation of Ocean Transportation Intermediary
4 License No. 017843 - Washington Movers, Inc. It's
5 FMC Docket No. 15-10. Can I have appearances for
6 counsel, please? And you don't have to stand up.

7 MR. TROIANO: Thank you. Brian Troiano
8 for the Bureau of Enforcement.

9 MS. DOTY: Brenda Doty, Bureau of
10 Enforcement.

11 MR. DOUMAR: George Doumar for
12 Washington Movers.

13 MR. PATEL: Raj Patel, also for
14 Washington Movers, Your Honor.

15 JUDGE GUTHRIDGE: All right. First,
16 before we go any further, let me ask you to turn
17 off your cell phones, those kind of things that
18 will make lots of noise and bother everybody.

19 Okay, we're here on Washington Movers'
20 request to present testimony of Norma Ghanem. Is
21 that how it's pronounced, ma'am?

22 MS. GHANEM: Yes.

1 JUDGE GUTHRIDGE: And as stated in the
2 order of October 26, 2016, Mr. Doumar, you have
3 one hour, up to one hour.

4 MR. DOUMAR: Yes, Your Honor.

5 JUDGE GUTHRIDGE: You can reserve part
6 of that for redirect, if you wish. Would you like
7 to do that?

8 MR. DOUMAR: Yes, Your Honor, I think 45
9 minutes and minutes to do that.

10 JUDGE GUTHRIDGE: All right.

11 MR. DOUMAR: I don't think I'll take 45
12 minutes, but I should do that just in case.

13 JUDGE GUTHRIDGE: All right. And the
14 Bureau of Enforcement will have an hour, also,
15 typical.

16 Before we get to that, though, Mr.
17 Doumar, what's the status of the 2013 tax returns,
18 or Mr. Patel?

19 MR. PATEL: Ms. Ghanem hasn't received
20 them, Your Honor. She has sent in the request to
21 the IRS.

22 JUDGE GUTHRIDGE: All right.

1 MR. DOUMAR: Yes, she had sent them in
2 prior to when we last talked, but she still hasn't
3 received them, Your Honor.

4 JUDGE GUTHRIDGE: Okay. And then I had
5 my office assistant for this hearing prepare a
6 book with the exhibits that have already been
7 admitted. And so if you're going to be asking the
8 Witness any questions dealing with the exhibits,
9 we have a book here if you'd like to use it.

10 MR. DOUMAR: All right. Thank you, Your
11 Honor.

12 JUDGE GUTHRIDGE: All right. Are you
13 ready to proceed?

14 MR. DOUMAR: Yes, Your Honor.

15 JUDGE GUTHRIDGE: Ms. Ghanem, could you
16 come up here, please?

17 MR. DOUMAR: Your Honor, should I ask
18 questions from the podium.

19 JUDGE GUTHRIDGE: If you wish. I put it
20 there. Ms. Ghanem, before you sit down could you
21 raise your right hand, please?

22 Whereupon,

1 NORMA GHANEM

2 was called as a witness and, having been first
3 duly sworn, was examined and testified as follows:

4 JUDGE GUTHRIDGE: All right, please be
5 seated. State your name and spell it, please.

6 THE WITNESS: Norma Ghanem.

7 JUDGE GUTHRIDGE: Is that on? Push the
8 button in the middle there so the green light
9 comes on. There you go.

10 THE WITNESS: Norma Ghanem. Norma,
11 N-O-R-M-A; Ghanem, G-H-A-N-E-M.

12 JUDGE GUTHRIDGE: All right. Mr.
13 Doumar.

14 MR. DOUMAR: Thank you, Your Honor.
15 Good afternoon, Ms. Ghanem.

16 THE WITNESS: Good afternoon.

17 MR. DOUMAR: Can you tell the Judge here
18 where you work?

19 THE WITNESS: I work in Washington
20 Movers International, Inc.

21 MR. DOUMAR: And what do you do for
22 Washington Movers?

1 THE WITNESS: I'm the president.

2 MR. DOUMAR: And how long have you been
3 the president?

4 THE WITNESS: Around three years.

5 MR. DOUMAR: And before you were the
6 president how long had you worked for Washington
7 Movers?

8 THE WITNESS: Around 20 years.

9 MR. DOUMAR: Now, what do you do as your
10 day-to-day duties as the president?

11 THE WITNESS: Everything needs to be
12 done.

13 MR. DOUMAR: Okay. Can you give the
14 Judge a few examples of everything?

15 THE WITNESS: I -- overlooking
16 documentation, rates with ship lines, wire
17 transfer with banks, communication with customers,
18 booking with ship lines, dock receipts master.

19 MR. DOUMAR: So that's just giving the
20 Court an idea of what you did. And what kind of
21 --

22 JUDGE GUTHRIDGE: Mr. Doumar, could I

1 clarify something? Ms. Ghanem, are you talking
2 about in the period the first 20 years you worked
3 there or in the last 2 years or the whole time?

4 THE WITNESS: No, Your Honor, I'm saying
5 the past three years. The 20 years I worked in
6 the accounting division and communications with
7 clients.

8 JUDGE GUTHRIDGE: Thank you.

9 MR. DOUMAR: So the period, again, to
10 clarify, when you describe the duties that you do
11 it's for the last three years, is that correct?

12 THE WITNESS: Yes.

13 MR. DOUMAR: And you worked for
14 Washington Movers before that for many years and,
15 again, I think you said accounting and
16 communications. What kind of duties would you do
17 as that?

18 THE WITNESS: In communications?

19 MR. DOUMAR: Yes, and accounting.

20 THE WITNESS: Accounting, I look over
21 invoices from ship line, if it matched the
22 contract. I paid the ship line trucking companies

1 and make sure that all the invoices' rate is
2 correct; the vendors, all bills incoming.

3 MR. DOUMAR: Okay, just trying to get an
4 idea. How many employees does Washington Movers
5 have today, if any?

6 THE WITNESS: Three.

7 MR. DOUMAR: And say, just to give the
8 Court an idea, how many employees did you have
9 five years ago when you were doing accounting?

10 THE WITNESS: Nine to 11.

11 MR. DOUMAR: What kind of items does
12 Washington Movers ship or move? Can you give some
13 examples of that?

14 THE WITNESS: Everything. Merchandise,
15 heavy equipment, cars, household goods, medical
16 equipment like wheelchairs. Everything.

17 MR. DOUMAR: And where would you get
18 your business generally?

19 THE WITNESS: Most times word of mouth.

20 MR. DOUMAR: Now, how are you related to
21 Mr. Sam Ghanem?

22 THE WITNESS: Sam's my husband.

1 MR. DOUMAR: Does Sam Ghanem do any work
2 for Washington Movers currently?

3 THE WITNESS: No.

4 MR. DOUMAR: When did he stop doing work
5 for Washington Movers?

6 THE WITNESS: Beginning of 2014.

7 MR. DOUMAR: Why did he -- is he an
8 officer or director of Washington Movers now?

9 THE WITNESS: No, absolutely.

10 MR. DOUMAR: When did he stop being an
11 officer and director, as far as you remember?

12 THE WITNESS: After his incident.

13 MR. DOUMAR: Okay, why don't you tell --

14 JUDGE GUTHRIDGE: I'm sorry, after what?

15 THE WITNESS: After the incident. After
16 his conviction.

17 JUDGE GUTHRIDGE: The incident.

18 MR. DOUMAR: And what happened? What
19 you describe as "the incident," what happened for
20 the Court, at the incident?

21 THE WITNESS: Well, he got arrested.

22 MR. DOUMAR: All right.

1 THE WITNESS: In December 21st. It was
2 a Saturday morning. He left the house, I don't
3 recall at what time he left the house. And then I
4 learned later from the FBI that he was arrested.

5 MR. DOUMAR: You say he left the house,
6 do you know what he was doing or why?

7 THE WITNESS: I was sleeping. I was
8 sleeping.

9 MR. DOUMAR: And you say you learned
10 from the FBI. Did anybody come to your house that
11 day?

12 THE WITNESS: Yeah. Yes.

13 JUDGE GUTHRIDGE: For the record that
14 was December 21, 2013?

15 MR. DOUMAR: Yes, Your Honor, December
16 21, 2013. And what happened when people came to
17 -- who came to your house and what happened?

18 THE WITNESS: Came hundreds of FBI
19 agents and the kids were sleeping and I was
20 sitting in the dining room when they knocked the
21 door and they dragged me out of the house and --

22 MR. DOUMAR: Did you have any idea why

1 this was happening?

2 THE WITNESS: No, I asked for three
3 hours what's going on? Tell me what's -- what
4 happened?

5 MR. DOUMAR: Well, what happened with
6 the business then?

7 THE WITNESS: I --

8 MR. DOUMAR: Well, to complete the
9 story, at some point did these agents and people
10 leave and leave you and the kids in the house?

11 THE WITNESS: Well, I was dragged to the
12 parking lot with my two minor kids and they had
13 machine guns pointed to my head that day. And
14 then I was -- they were there for hours and hours.
15 And finally, the decided to tell me and I was
16 begging them what's going on? Tell me. Just tell
17 me why you're here. And they told me that Sam was
18 -- they didn't tell me details. I learned that he
19 violated his license by shipping rifles.

20 MR. DOUMAR: Now, what happened to the
21 business at that point?

22 THE WITNESS: I came back to the office

1 on December 23rd.

2 MR. DOUMAR: Was that the next Monday?

3 THE WITNESS: Yes.

4 MR. DOUMAR: Do you remember?

5 THE WITNESS: I don't recall it was
6 Monday or Tuesday, I don't know. When I entered
7 the warehouse there was no computer, no piece of
8 paper, no files, no server, nothing in anybody's
9 desk. Not on my desk, Sam's desk, Sandra's desk,
10 every place, no papers whatsoever.

11 MR. DOUMAR: Well, was Sam there with
12 you at that time?

13 THE WITNESS: No, no, he was not. He
14 was not. I was with Sandra and other people.

15 MR. DOUMAR: And what did you do when
16 you found that situation?

17 THE WITNESS: I was helpless. I did not
18 know what to do. There was no money. The money
19 was seized, too. And then I had over 35
20 shipments, some of it arrived to destinations,
21 some was on vessels. And I did not have a way to
22 track these shipments. I had to call the IT to

1 put the server back and then we started searching
2 for these shipments in order to pay this -- to
3 release it, to pay the ship line to release the
4 shipment to the clients. It's their goods, their
5 cars, and they're not (inaudible). I had to come
6 up with the money.

7 MR. DOUMAR: Well, how did you do that?

8 THE WITNESS: My life insurance money
9 and my kids' tuition money and then I sold some
10 gold. I borrow money from family.

11 MR. DOUMAR: And during this time
12 period, I mean, who was in charge of running
13 Washington Movers from that time period forward?

14 THE WITNESS: I was.

15 MR. DOUMAR: Were you able to keep the
16 business going after that?

17 THE WITNESS: Yes.

18 MR. DOUMAR: And has the business
19 continued to this day?

20 THE WITNESS: Yes. Yes, the business
21 continued.

22 MR. DOUMAR: Now, the business, did it

1 grow or shrink since late 2013, early 2014?

2 THE WITNESS: It shrank from 90 to 30
3 percent.

4 MR. DOUMAR: And when you say "90 to 30
5 percent," you're just giving a relative value sort
6 of?

7 THE WITNESS: Yes, yes.

8 MR. DOUMAR: Okay.

9 JUDGE GUTHRIDGE: What did you mean by
10 "relative value?"

11 MR. DOUMAR: Yes, I didn't understand
12 when she said it shrunk from 90 to 30. I think
13 she was just -- I'm not quire sure I followed
14 specifically what that meant, but --

15 JUDGE GUTHRIDGE: I'm not sure I still
16 do, that's why I was asking.

17 MR. DOUMAR: Well, you say "from 90 to
18 30 percent." Are you saying the business dropped
19 by two-thirds or it dropped a lot, you don't know?

20 THE WITNESS: A lot. A lot. A lot.

21 MR. DOUMAR: All right. Now, you know,
22 when you say Sam left that day, were you at that

1 time going to the business every day and working
2 for the business of Washington Movers?

3 THE WITNESS: Yes.

4 MR. DOUMAR: Before the incident
5 happened?

6 THE WITNESS: Before the incident, yes.

7 MR. DOUMAR: Did you or anyone else at
8 Washington Movers have any indication that Sam was
9 involved in any activity that would get him in
10 trouble?

11 THE WITNESS: Absolutely not, no, no.

12 MR. DOUMAR: Was anyone at Washington
13 Movers, to your knowledge, involved in any
14 improper activity with Sam or with anyone else
15 during that timeframe?

16 THE WITNESS: No, no. It was a
17 Saturday, the day that he left with the -- that
18 snitch. I learned later that he convinced Sam
19 that he had paper to ship these rifles.

20 MR. DOUMAR: And is that something Sam
21 did separately or as part of Washington Movers?

22 THE WITNESS: He -- it was on Saturday

1 separately. We close on Saturday. We don't -- we
2 open Monday through Friday.

3 MR. DOUMAR: And you didn't know where
4 Sam was going that morning?

5 THE WITNESS: I did not.

6 MR. DOUMAR: Okay. Did Sam continue to
7 have any involvement with the business during 2014
8 at all?

9 THE WITNESS: He did some transition. I
10 learned later that he did sign some contracts.

11 MR. DOUMAR: You say you learned later,
12 who generally was supposed to sign contracts
13 during that period?

14 THE WITNESS: I am.

15 MR. DOUMAR: How would it come about
16 that Sam might sign contracts?

17 THE WITNESS: I learned later that
18 Sandra, my secretary, was checking his emails
19 every other day and she saw that attachment she
20 printed out and then she handed it to him.

21 MR. DOUMAR: And you say checking
22 emails, what email are you referring to?

1 THE WITNESS: Sam@wmius.com.

2 MR. DOUMAR: Now was that Sam's -- you
3 say that was Sam's email. She checked it every
4 day. If it was Sam's email, why would she be
5 checking it every day?

6 THE WITNESS: It's the company's email.
7 It's the company's email.

8 MR. DOUMAR: So that was something that
9 was --

10 THE WITNESS: Belonged to Washington
11 Movers, it's not his personal email.

12 MR. DOUMAR: Okay. And other people
13 looked at that email account and used that email
14 account at Washington Movers?

15 THE WITNESS: We -- a lot of clients
16 today, they send emails to the -- they send him --
17 they send like Washington Movers request to this
18 email.

19 MR. DOUMAR: And how does Washington
20 Movers respond to those emails?

21 THE WITNESS: We take the order from
22 this and we respond from a different email. But

1 we keep in it because we still receive business to
2 this email. It's been there for over 10 years.

3 MR. DOUMAR: All right. Well, do you
4 know if Sam Ghanem has any plans to come back to
5 Washington Movers?

6 THE WITNESS: No.

7 MR. DOUMAR: Do you have any plans to
8 allow him to come back to Washington Movers?

9 THE WITNESS: Absolutely not. Even if
10 he try, he cannot. By law he's prohibited to
11 continue.

12 MR. DOUMAR: And why is that?

13 THE WITNESS: He's not allowed anymore.

14 MR. DOUMAR: If he were allowed would
15 you let him come back?

16 THE WITNESS: No, no, it's my company.
17 It's not his.

18 MR. DOUMAR: Did you take additional
19 steps to try to separate yourself from the
20 incident with your husband, Sam Ghanem? Do
21 anything to start another company?

22 THE WITNESS: I have tried, yes.

1 MR. DOUMAR: What did you do?

2 THE WITNESS: I -- in November of 2014,
3 I've tried to open First Eagle. It's logistic,
4 too, a shipping company.

5 MR. DOUMAR: And what happened with
6 that?

7 THE WITNESS: My application was denied.

8 MR. DOUMAR: And why was that?

9 THE WITNESS: Based on the incident with
10 my husband.

11 JUDGE GUTHRIDGE: Sorry, I didn't quite
12 follow that. That was an application to become an
13 OTI?

14 THE WITNESS: Yes, with my new company.

15 JUDGE GUTHRIDGE: First Eagle?

16 THE WITNESS: First Eagle, yes. I
17 submit the application and it was denied.

18 MR. DOUMAR: Were you able to obtain
19 good character references for the application?

20 THE WITNESS: Yes, I did.

21 MR. DOUMAR: All right. And so you say
22 it was denied due to the incident. What do you

1 mean by that?

2 THE WITNESS: The -- apparently, I
3 learned later, that they're seeing me through my
4 husband's conviction. And Sam's incident is not
5 indicative to my true character and it should not
6 dictate the rest of my life and my children's
7 life.

8 MR. DOUMAR: What was Sandra Rodriguez'
9 (phonetic) relationship with Washington Movers
10 during this, say, 2012 to '15 time period?

11 THE WITNESS: She started in the company
12 as a company clerk and then she gained experience
13 throughout the years and she became office
14 manager.

15 MR. DOUMAR: Do you know if she ever
16 used any stamps or herself signed documents with
17 Sam Ghanem's signature?

18 THE WITNESS: Yes, she used the -- Sam's
19 stamp.

20 MR. DOUMAR: Do you know if she did that
21 even during 2014 sometimes or not?

22 THE WITNESS: Yes. Yes, she did. She

1 did use that.

2 MR. DOUMAR: Well, was she authorized to
3 do that by you?

4 THE WITNESS: No.

5 MR. DOUMAR: Do you know why she did it
6 anyway?

7 THE WITNESS: She did it like -- we did
8 not discuss that (inaudible) the company to my
9 name. Maybe she thought that she could.

10 MR. DOUMAR: Does she still work at
11 Washington Movers?

12 THE WITNESS: No, no longer. She
13 stopped a few months ago.

14 MR. DOUMAR: What does she do now?

15 THE WITNESS: She opened her own
16 company.

17 MR. DOUMAR: What kind -- is it --

18 THE WITNESS: It's a logistic shipping.

19 MR. DOUMAR: A shipping company?

20 THE WITNESS: Yes.

21 MR. DOUMAR: Are you a partner in that
22 business at all?

1 THE WITNESS: No. No, I'm not.

2 MR. DOUMAR: All right. Today at
3 Washington Movers how many employees do you have?

4 THE WITNESS: Three.

5 MR. DOUMAR: And are you doing -- how
6 many days a week do you work at Washington Movers
7 currently?

8 THE WITNESS: Six days.

9 MR. DOUMAR: And how many days have you
10 worked there since 2014?

11 THE WITNESS: Five, six days, 60 to 65
12 hours a week.

13 MR. DOUMAR: Okay. Does anyone else
14 help you manage Washington Movers now?

15 THE WITNESS: No, no one's helping.

16 MR. DOUMAR: All right. Is there
17 anything else you'd like to say to the Court
18 relating to the proposed revocation of your
19 license at Washington Movers?

20 THE WITNESS: I just want to, Your
21 Honor, I work in this business over 20 years.
22 It's no longer Sam's business. I spent half of my

1 life in this business. My children depend on me.
2 And I don't know what to do anything beside this.
3 I want the FMC to stop seeing me through my
4 husband's conviction.

5 Any lady could, like, divorce her
6 husband, but I cannot. What do I tell my
7 children? What do I tell my son? They're still
8 suffering the separation from their father. I
9 cannot do this to convince anyone. I suffered
10 enough. He made a mistake. He broke the law
11 intentionally or unintentionally. He's serving.
12 He paid dearly. He paid \$72,000, he went to jail,
13 and he's going to continue to pay.

14 MR. DOUMAR: No further questions. You
15 have anything else, Ms. Ghanem? No further
16 questions, Your Honor.

17 JUDGE GUTHRIDGE: Mr. Troiano?

18 THE WITNESS: Thank you.

19 MR. TROIANO: Ms. Doty's going to
20 perform cross- examination.

21 JUDGE GUTHRIDGE: Ms. Doty?

22 (Discussion off the record)

1 MS. DOTY: Good afternoon, Ms. Ghanem.

2 THE WITNESS: Good afternoon.

3 MS. DOTY: To begin with I just wanted
4 to go back over some of the things that you talked
5 about with Mr. Doumar. So when Sam was arrested,
6 where was that? Where did that take place?

7 THE WITNESS: In District Heights,
8 Maryland.

9 MS. DOTY: Do you know where exactly?

10 THE WITNESS: In the parking lot of
11 Washington Movers.

12 MS. DOTY: Okay, thank you. And I was
13 unclear on the decrease to Washington Movers'
14 business. Was that decrease of revenue, of number
15 of shipments? What did you mean by a decrease?

16 THE WITNESS: Everything. Revenue,
17 shipping business, everything.

18 MS. DOTY: So all of it down to 30
19 percent of what it was previously?

20 THE WITNESS: Yes, yes.

21 MS. DOTY: Okay. So as of January 1,
22 2014, you became president of Washington Movers?

1 THE WITNESS: Yes.

2 MS. DOTY: At any time between that date
3 and the present has Washington Movers had any
4 other officers?

5 THE WITNESS: No, only me.

6 MS. DOTY: Only you, okay. So you still
7 are the sole officer of the company?

8 THE WITNESS: Yes.

9 MS. DOTY: Okay. So Sandra Rodriguez
10 was never an officer of the company?

11 THE WITNESS: Yes, she was. She was an
12 officer in the company.

13 MS. DOTY: She was?

14 THE WITNESS: Yes.

15 MS. DOTY: But she's not at this time?

16 THE WITNESS: At this time, yeah, just
17 recently, like maybe a month ago, less than a
18 month.

19 MS. DOTY: It's been about a month since
20 she was not an officer?

21 THE WITNESS: Yes.

22 MS. DOTY: When she was, what title did

1 she hold? What was her --

2 THE WITNESS: Office manager.

3 MS. DOTY: Was she president? Was she
4 vice president?

5 THE WITNESS: Sorry. She was office
6 manager.

7 MS. DOTY: And as office manager what
8 were her duties and responsibilities?

9 THE WITNESS: Her responsibility?

10 MS. DOTY: Mm-hmm, what did she do for
11 the company?

12 THE WITNESS: She followed up with
13 clients, documentation, and she trained secretary,
14 office clerk. That's what she does. Everything,
15 like whatever I asked her to do that would help me
16 out, she does.

17 MS. DOTY: Did she negotiate service
18 contracts?

19 THE WITNESS: Negotiate? No.

20 MS. DOTY: She didn't sign service
21 contracts?

22 THE WITNESS: No, she didn't.

1 MS. DOTY: But you did mention that she
2 used Sam's stamp to sign service contracts?

3 THE WITNESS: I learned later that she
4 printed out those -- she requested a booking from
5 a specific company. They told her the contract is
6 expired. She printed this paper and then she gave
7 it to Sam.

8 MS. DOTY: So Sam signed it?

9 THE WITNESS: I learned later that she
10 walked into where he worked close by and then he
11 signed it.

12 MS. DOTY: Okay. Currently is
13 Washington Movers conducting operations under its
14 FMC license?

15 THE WITNESS: Yes.

16 MS. DOTY: And who is the QI at the
17 present time?

18 THE WITNESS: Sam.

19 MS. DOTY: In November of 2015, you
20 filed an application with the Commission for
21 approval of yourself as a replacement QI?

22 THE WITNESS: Yes.

1 MS. DOTY: And what is the status of
2 that application?

3 THE WITNESS: I withdraw the
4 application.

5 MS. DOTY: And when did you withdraw
6 that?

7 THE WITNESS: Same year.

8 JUDGE GUTHRIDGE: Ms. Ghanem, are you
9 referring to the First Eagle?

10 THE WITNESS: No, for Washington Movers,
11 I withdraw.

12 JUDGE GUTHRIDGE: (inaudible)

13 THE WITNESS: Yes.

14 MS. DOTY: Yes, as a replacement QI for
15 Washington Movers.

16 THE WITNESS: Yes.

17 MS. DOTY: Yes. And why did you
18 withdraw the application?

19 THE WITNESS: Just a clean break. When
20 I -- because of my husband's conviction, the name
21 of the company caused me to withdraw that
22 application.

1 MS. DOTY: So at the time are there any
2 current applications on file to replace Washington
3 Movers' qualifying individual?

4 THE WITNESS: No.

5 MS. DOTY: You said Sam was removed as
6 an officer and director of the company after the
7 incident. That was before he was tried and
8 convicted. Why was he removed at that point in
9 time?

10 THE WITNESS: I became the owner.

11 MS. DOTY: Yes.

12 THE WITNESS: Because of his conviction.

13 MS. DOTY: At the point of the transfer,
14 according to your documentation that has been
15 presented here, the transfer happened in January
16 of 2014.

17 THE WITNESS: Yes, yes, the transfer.

18 MS. DOTY: Right. So at that point he
19 hadn't been to trial, he hadn't been convicted
20 yet.

21 THE WITNESS: Yeah, he wasn't.

22 MS. DOTY: So why the decision to do

1 that then?

2 THE WITNESS: It was my decision to take
3 over the company.

4 MS. DOTY: And at that point in time, as
5 the new owner and the new president, why did you
6 not notify the FMC of that change in ownership,
7 change in who was in charge?

8 THE WITNESS: I started the process to
9 do so. 2014, it wasn't like any other year that I
10 lived. I've had so many things to do for
11 Washington Movers to bring -- it was under zero.
12 The company is -- as I told Mr. Doumar earlier, I
13 had to come up with the money. And to be honest
14 with you, I did not have money to do -- to even
15 hire a lawyer for the company. I paid all my
16 money for my husband's lawyer, for the people's
17 shipments to be released.

18 MS. DOTY: You're aware that you can
19 file an application to change the qualifying
20 individual without an attorney. You can do that
21 yourself.

22 THE WITNESS: Yes.

1 MS. DOTY: But you chose not to at that
2 time?

3 THE WITNESS: I've asked -- I called and
4 then I was -- honestly, any changes I make in
5 2014, I was scared that they will use it against
6 him in court. Any changes. He was awaiting for
7 his trial.

8 MS. DOTY: So, you said at that point,
9 too, that Sam stopped working. Not only did he
10 stop being an officer and director, he stopped
11 working at that same time.

12 THE WITNESS: Yes, he worked --

13 MS. DOTY: So what was Sam doing? I
14 mean --

15 THE WITNESS: He worked in Horizon
16 Motors, wholesale, yeah.

17 MS. DOTY: Horizon Motors?

18 THE WITNESS: Motors, yes, buying and
19 selling cars.

20 MS. DOTY: So he didn't receive pay, he
21 didn't do anything for Washington Movers? He
22 didn't negotiate a service contract. He didn't

1 open bank accounts for the company.

2 THE WITNESS: He -- I learned later that
3 he signed the MSC contract and then Sandra handed
4 it to him. And because he was under investigation
5 at that time, every time that Washington Movers
6 opened an account with any banks, we will have a
7 letter a month later that the bank does not want
8 to bank with us anymore because of the
9 investigation. If I walk to any bank, Bank of
10 America let's say, any bank, and put my name and
11 his name, I will not be allowed to open with them
12 account, never, with my Social Security.

13 MS. DOTY: Okay, so you're saying that
14 Sam didn't have authority from you or Washington
15 Movers to open bank accounts in 2014?

16 THE WITNESS: He did some of the
17 transactions that he did -- I knew about, some
18 not.

19 MS. DOTY: And in 2014?

20 THE WITNESS: Yes.

21 MS. DOTY: How about in 2015?

22 THE WITNESS: No.

1 MS. DOTY: And when he did open those
2 accounts, in what capacity did he do that?

3 THE WITNESS: Can you repeat that
4 question, please?

5 MS. DOTY: In other words, was he an
6 officer of the company?

7 THE WITNESS: No, he was not.

8 MS. DOTY: Did he have your
9 authorization to open those accounts?

10 THE WITNESS: No, no.

11 MS. DOTY: But then the company did
12 write checks from those accounts, they did make
13 deposits to those accounts that Sam opened?

14 THE WITNESS: As I told you earlier,
15 every time I go try to open an account with -- we
16 opened more than five with five different banks
17 and they shut us immediately. And at the time, I
18 don't have any piece of paper on me. The bank
19 always asked for the ownership, any proof, piece
20 of paper to prove that I am the owner. I did not
21 have anything except the transfer paper.

22 MS. DOTY: So you had the transfer

1 paper.

2 THE WITNESS: It's not enough.

3 MS. DOTY: But still, the bank accounts
4 were opened. There was a bank account that was
5 opened with SunTrust in February of 2014. Yes?

6 THE WITNESS: February?

7 MS. DOTY: Yes.

8 THE WITNESS: Of 2000?

9 MS. DOTY: '14.

10 THE WITNESS: '14?

11 MS. DOTY: Yes.

12 THE WITNESS: Account for Washington
13 Movers with SunTrust?

14 MS. DOTY: Yes.

15 THE WITNESS: Yes.

16 MS. DOTY: And Sam opened that account?

17 THE WITNESS: I learned later, yes, that
18 Sam opened that account.

19 MS. DOTY: And Washington Movers made
20 deposits to that account?

21 THE WITNESS: Yes.

22 MS. DOTY: They wrote checks for the

1 business from that account?

2 THE WITNESS: This account was opened
3 for two months maybe and closed. Are you talking
4 about this account? Not one account that we
5 opened stayed more than two months.

6 MS. DOTY: My understanding is the
7 SunTrust account was open until October of '14, so
8 about eight months.

9 THE WITNESS: 2014, yes. Then I gave
10 you the reason why I was not able to put my name.

11 MS. DOTY: But the bank account was used
12 by the company?

13 THE WITNESS: Yes.

14 MS. DOTY: And the bank account at PNC
15 Bank that was opened in October of 2014, Sam
16 opened that, as well?

17 THE WITNESS: Yes. It was his name,
18 yes, only on the account.

19 MS. DOTY: And you didn't authorize him
20 to open that account?

21 THE WITNESS: Some I authorized, some
22 not. I don't recall which one I did authorize,

1 and then I told you why.

2 MS. DOTY: But the company used --

3 THE WITNESS: If the bank agree --

4 MS. DOTY: Yes.

5 THE WITNESS: If the bank agree to take
6 my name. And even before Sam's conviction, the
7 past like 7, 8 years, 20 years, Sam has nothing to
8 do with accounting. Even his name only, account.
9 He never even have a log in to any bank account.
10 I do all that.

11 MS. DOTY: But the company used the
12 account?

13 THE WITNESS: Yes.

14 MS. DOTY: They wrote checks and made
15 deposits, though?

16 THE WITNESS: Yes.

17 MS. DOTY: Was he authorized to sign
18 checks whatever account might have been opened at
19 that point in time? Was Sam authorized to sign
20 checks in 2014?

21 THE WITNESS: Most of the bills I
22 approved to be entered into the system and the

1 secretary used his stamp to sign those checks.

2 MS. DOTY: Used Sam's stamp?

3 THE WITNESS: Yes. It was a stamp, not
4 signature. Not him signing them.

5 MS. DOTY: And is that also true in
6 2015?

7 THE WITNESS: No.

8 MS. DOTY: That Sam's stamp was used?

9 THE WITNESS: Yes, yes.

10 MS. DOTY: But you're not aware of
11 whether -- I'm sorry, and those checks, those with
12 the Sam stamps, they were used to pay vessel
13 operators' pay, to pay truckers' pay?

14 THE WITNESS: No, actually all this, the
15 ship lines, I pay all of it online, wire transfer.
16 We don't send ship lines any checks. This stamp
17 for Verizon, for like phone, for water,
18 electricity, but the ship lines, I pay ship lines.
19 I do wire transfer.

20 MS. DOTY: I believe you may have
21 touched on this before, but during this period and
22 even now you track Washington Movers' finances,

1 you review its books?

2 THE WITNESS: Yes.

3 MS. DOTY: And I assume that you are
4 authorized to sign checks for the company?

5 THE WITNESS: Now?

6 MS. DOTY: Yes.

7 THE WITNESS: Yes.

8 MS. DOTY: 2014, 2015, now.

9 THE WITNESS: Yes.

10 MS. DOTY: Is anyone else authorized?

11 THE WITNESS: No.

12 MS. DOTY: Not even authorized to use a
13 stamp?

14 THE WITNESS: Not anymore, no.

15 MS. DOTY: So between November of 2014
16 and August of 2015, the signature cards on the
17 Industrial Bank account only show Sam as an
18 authorized signer. Are you saying that you signed
19 checks for the company during that time period
20 regardless whether you were on the account or not?

21 THE WITNESS: Say the data again,
22 please.

1 MS. DOTY: Between November of 2014 and
2 August of 2015.

3 THE WITNESS: November through August?

4 MS. DOTY: Yes. Between those dates the
5 bank account with Industrial Bank, which was
6 opened in November of '14, but you were not added
7 as a signature on the -- an authorized signature
8 on the signature card with the bank until August
9 of 2015. Sam was the only one authorized directly
10 with the bank to sign checks, make deposits. But
11 your testimony is that you did those things? You
12 used that bank account for the company?

13 THE WITNESS: I did use the account for
14 the company, yes.

15 MS. DOTY: And when you were added to
16 that bank account as an authorized signer in
17 August of 2015, did you certify to the bank that
18 as secretary of Washington Movers Sam was the
19 president and you were the vice president?

20 THE WITNESS: I don't recall that
21 (inaudible).

22 MS. DOTY: Would it help refresh your

1 memory if I showed you the copy of the signature
2 care?

3 THE WITNESS: I always go to the bank to
4 add my name to the account or remove. I don't
5 remember if I was a secretary or a vice president
6 or I don't know what -- I don't remember.

7 MR. TROIANO: You want me to find it?

8 MS. DOTY: Yeah.

9 JUDGE GUTHRIDGE: Are you going to show
10 it to Ms. Ghanem? Ms. Doty?

11 MS. DOTY: I'm sorry?

12 JUDGE GUTHRIDGE: Are you going to be
13 showing it to Ms. Ghanem?

14 MS. DOTY: Yes.

15 JUDGE GUTHRIDGE: Would you like to use
16 this one for her?

17 MS. DOTY: Yes. I just need the number.
18 If I had the number I'd find it quicker.

19 This is Washington Movers Exhibit M that
20 I'm showing you there. Is that appear to be your
21 signature on there?

22 THE WITNESS: I added my name to the

1 account, yes, I remember. And I did tell you the
2 reason at the beginning of the conversation.

3 JUDGE GUTHRIDGE: I'm sorry, I didn't
4 understand what you're saying.

5 THE WITNESS: I did tell you the reason.
6 The bank needs papers that proves that I am the
7 president.

8 MS. DOTY: Right.

9 THE WITNESS: I did not have it in hand.
10 In 2014, Sam was not convicted yet. He was going
11 to court.

12 MS. DOTY: Yes, I understand.

13 MR. DOUMAR: Counsel, can I take a quick
14 look at that?

15 MS. DOTY: Sure.

16 THE WITNESS: I don't remember. I
17 don't.

18 MR. DOUMAR: Yes, we couldn't find this
19 in our (inaudible). Okay, thank you.

20 MS. DOTY: Can you read the first line
21 or that first paragraph?

22 JUDGE GUTHRIDGE: Ms. Doty, she should

1 use this one so you can keep that one in your
2 hands.

3 MS. DOTY: If you then read this.

4 THE WITNESS: Thank you.

5 MS. DOTY: Sure. Thank you. So the
6 first paragraph.

7 JUDGE GUTHRIDGE: I'm sorry, I gave you
8 the wrong one. Use this one. That one's got --
9 might have notes marked on some exhibits.

10 MS. DOTY: Does that first line -- can
11 you read that for us, please?

12 THE WITNESS: Yes, I see that I
13 certified that I'm a secretary. Yes.

14 MS. DOTY: And you believe that is your
15 signature at the bottom of the page?

16 THE WITNESS: Yes, that's my signature.

17 MS. DOTY: And why was Sam not removed
18 from this particular account until March of 2016?

19 THE WITNESS: After he turned himself in
20 and I did not remove him from the bank. I was
21 waiting, like, to -- he's in jail and I was
22 waiting until I get my license to even change the

1 bank, change everything. It slowed all the
2 process.

3 MS. DOTY: Thank you. In 2014, did you
4 negotiate any service contracts on behalf of
5 Washington Movers?

6 THE WITNESS: 2014.

7 MS. DOTY: Right.

8 THE WITNESS: Mostly with MSC, yes. MSC
9 is the most, like, company that we -- provide us
10 containers.

11 MS. DOTY: Did you sign those contracts
12 that you negotiated?

13 THE WITNESS: I learned later that Sam
14 did, signed it, as I told you earlier.

15 MS. DOTY: Is that also true for 2015?
16 Did you negotiate any service contracts in 2015?

17 THE WITNESS: It's signed by me, the
18 '15/'16.

19 MS. DOTY: In 2015.

20 THE WITNESS: I don't know. I don't
21 know.

22 MS. DOTY: Did you review the service

1 contracts that were negotiated on behalf of
2 Washington Movers in 2014?

3 THE WITNESS: Most of these papers will
4 be printed from Sandra and she'll bring it to me,
5 the rates for the new contract, yes.

6 MS. DOTY: Okay. And that was true in
7 2015, as well?

8 THE WITNESS: The rates? The contract?

9 MS. DOTY: The process, the review.

10 THE WITNESS: Well, yeah, yes.

11 MS. DOTY: And who was authorized to
12 negotiate and sign service contracts in 2014?

13 THE WITNESS: In 2014.

14 MS. DOTY: Mm-hmm.

15 THE WITNESS: Because of Sam -- it was
16 still his name on the license and the contract,
17 like, his incident happened on the 21st of
18 December and we're talking about January, like 10
19 days. Yeah.

20 MS. DOTY: So Sam was authorized?

21 THE WITNESS: It's automatic. He --
22 automatic his name with MSC as the president. I

1 did not make --

2 MS. DOTY: And you did not change that.

3 You did not notify MSC that there --

4 THE WITNESS: We've tried. We've tried.

5 MS. DOTY: -- had been a change of
6 ownership?

7 THE WITNESS: We've tried. I spoke to
8 MSC. They said aren't you going to be on the
9 license from now on? After then, we will switch
10 your name, we will add your name to the contract.

11 MS. DOTY: So why did you not sign any
12 service contracts in 2014 or 2015?

13 THE WITNESS: As I told you earlier, the
14 secretary took it to Sam, not to me.

15 MS. DOTY: Other than service contracts,
16 did Sam sign any other types of contracts for
17 Washington Movers?

18 THE WITNESS: No.

19 MS. DOTY: That you're aware of, no?

20 THE WITNESS: No.

21 MS. DOTY: No utilities or --

22 THE WITNESS: MSC.

1 MS. DOTY: -- anything? Yes, not with a
2 vessel operator, but another business-related
3 contract for paper or, you know, office supplies
4 or something?

5 THE WITNESS: No.

6 MS. DOTY: No, he did not, okay. And
7 does Washington Movers do any domestic moving of
8 cargo, not international?

9 THE WITNESS: We do moving, storage,
10 delivery.

11 MS. DOTY: And are you licensed
12 domestically for that? Is the company licensed
13 domestically for that?

14 THE WITNESS: We started our company as
15 a moving and storage company. We added shipping
16 to it in 2008. Washington Movers was started as a
17 shipping -- as a moving and storage company.

18 MS. DOTY: So if there's a license
19 required for that, the company has one?

20 THE WITNESS: We contract with other
21 people. We use other companies' service.

22 JUDGE GUTHRIDGE: You added the maritime

1 shipping in 2008, is that what you said?

2 THE WITNESS: We added, yeah, the
3 shipping around that time.

4 JUDGE GUTHRIDGE: Around then, thank
5 you.

6 MS. DOTY: I may have asked this
7 question before, but going back to applications,
8 qualifying individual applications, OTI
9 application with EFMC, you had mentioned First
10 Eagle, and you had mentioned that that application
11 was denied?

12 THE WITNESS: Yes.

13 MS. DOTY: Did you appeal the denial?

14 THE WITNESS: I -- we did not. I don't
15 remember. I don't know, I don't remember.

16 MS. DOTY: I think we're done. Thank
17 you.

18 JUDGE GUTHRIDGE: Mr. Doumar?

19 MR. DOUMAR: Yes, just a few questions
20 on redirect.

21 JUDGE GUTHRIDGE: Mr. Doumar.

22 MR. DOUMAR: Thank you, Your Honor.

1 Fortunately, it's not that big a courtroom so we
2 can still hear each other.

3 Ms. Ghanem, you discussed your
4 application to be a qualified individual for
5 Washington Movers, you remember that examination
6 from Ms. Doty? She asked you about whether you'd
7 made an application to a qualified individual?

8 THE WITNESS: Yes.

9 MR. DOUMAR: And you said you withdrew
10 that application?

11 THE WITNESS: Yes.

12 MR. DOUMAR: What was the status of that
13 application after you filed it? Did something
14 happen to cause you to withdraw it?

15 THE WITNESS: Yes, when I read the --
16 they brought all Sam's conviction to this matter.
17 All I saw on the papers it's nothing about me,
18 it's all about Sam's conviction.

19 MR. DOUMAR: And was that in response to
20 your initial application to be a qualified
21 individual for Washington Movers?

22 THE WITNESS: Yes.

1 MR. DOUMAR: Do you know if you can have
2 two applications pending at one time?

3 THE WITNESS: I don't know.

4 MR. DOUMAR: You don't know. There was
5 a discussion of your status as an officer. I'll
6 hand you what had been -- actually, I probably
7 could use the binder in that case, but if you
8 could turn to what's been marked for
9 identification and admitted as BOE No. 9. I think
10 it's number 9. Hopefully, our numbering's
11 consistent.

12 JUDGE GUTHRIDGE: I used what went out
13 in that order in November.

14 MR. DOUMAR: Is that number 9? Why
15 don't you turn to page 2, Ms. Ghanem?

16 JUDGE GUTHRIDGE: Are you talking about
17 the 2015 annual report to the Commonwealth of
18 Virginia, State --

19 MR. DOUMAR: That's it, Your Honor.
20 It's titled on the first page, "2015 Annual
21 Report." And you see, I think you were asked
22 about the officers of the corporation and Sandra

1 and others. You see on this page 2 of the annual
2 report, do you remember how this got filled out?
3 If you don't, that's fine. Do you see your name
4 in the upper right?

5 THE WITNESS: Yes, yes.

6 MR. DOUMAR: You see your name.

7 THE WITNESS: That's my name. I'm an
8 officer and director.

9 MR. DOUMAR: What's your title listed
10 there in the annual report?

11 THE WITNESS: Officer and director.

12 MR. DOUMAR: And under "Title," the
13 second line, what's next to that?

14 THE WITNESS: Office manager.

15 MR. DOUMAR: No, the right-hand side.

16 THE WITNESS: President,
17 secretary-treasurer.

18 MR. DOUMAR: No further questions, Your
19 Honor.

20 JUDGE GUTHRIDGE: To refresh my
21 recollection, Mr. Doumar, if I recall correctly,
22 and I think we talked about this when Mr. Patel

1 was here, as I understand it these forms are
2 printed by the Commonwealth and sent to whoever
3 the party is.

4 MR. DOUMAR: That's probably what
5 happened, Your Honor, yes. I think that's usually
6 correct.

7 JUDGE GUTHRIDGE: Because as I interpret
8 these, in the left column is how it comes. I look
9 up, it says, "Mark appropriate," and this area
10 below is blank and there's box, "Information is
11 correct," "Information is incorrect." And on this
12 one it had "Norma Ghanem, office manager," and the
13 box "incorrect" is checked. And then in the right
14 column somebody added, it looks to me like
15 somebody other than the State Corporation
16 Commission added, "Norma Ghanem, president,
17 secretary-treasurer," with an address.

18 MR. DOUMAR: That's correct, Your Honor.

19 JUDGE GUTHRIDGE: Okay.

20 MR. DOUMAR: I mean, we have people
21 listed as officers who are called export manager,
22 accounting. So generally the officers of a

1 corporation are the president, the secretary, and
2 the treasurer, Your Honor, from a corporate law
3 standpoint.

4 JUDGE GUTHRIDGE: Ms. Ghanem, if you
5 look at the right column of that page of 2 of that
6 exhibit, where the type is different from in the
7 left column where your name is.

8 THE WITNESS: Yes.

9 JUDGE GUTHRIDGE: Did you add that to
10 this form? Do you recall?

11 THE WITNESS: I don't remember, Your
12 Honor.

13 JUDGE GUTHRIDGE: I'm sorry?

14 THE WITNESS: I don't remember.

15 MR. DOUMAR: No further questions, Your
16 Honor.

17 JUDGE GUTHRIDGE: All right. Thank you,
18 Ms. Ghanem.

19 THE WITNESS: Thank you.

20 JUDGE GUTHRIDGE: You can step down.

21 MR. DOUMAR: Your Honor, I'm sorry, can
22 I ask one more question that was on my list?

1 Sorry, I hate to sound like Columbo.

2 JUDGE GUTHRIDGE: You do, don't you? If
3 you turn on the microphone, just do it there.

4 MR. DOUMAR: Thank you, Your Honor. I
5 think Ms. Doty asked you --

6 JUDGE GUTHRIDGE: Is the microphone on?

7 MR. DOUMAR: Yes, Your Honor. I'm just
8 not speaking directly into it. I think Ms. Doty
9 asked you about your business and the fall in your
10 business after the incident in 2013. Has your
11 business actually improved since early 2014, right
12 after this incident? Has it come back at all?

13 THE WITNESS: Lately a little bit, yeah,
14 but in 2014, it was the worst year.

15 MR. DOUMAR: And after 2014, it's
16 improved a little bit?

17 THE WITNESS: Yes, yes. Yes.

18 MR. DOUMAR: And why is that?

19 THE WITNESS: Because I'm there.

20 MR. DOUMAR: Okay.

21 THE WITNESS: I work 65 hours a week.

22 MR. DOUMAR: No further questions, Your

1 Honor.

2 JUDGE GUTHRIDGE: Anything else, Ms.

3 Doty?

4 MS. DOTY: No, Your Honor.

5 JUDGE GUTHRIDGE: All right.

6 (Witness excused)

7 JUDGE GUTHRIDGE: And as I understand
8 it, that's the only witness you wanted to present.

9 MR. DOUMAR: That's correct, Your Honor.

10 JUDGE GUTHRIDGE: We don't -- if I
11 understand it, we do not know when the tax
12 information will get here.

13 MR. DOUMAR: We do not, Your Honor. We
14 can try to follow up on that, but the IRS is not
15 always responsive as to exactly when the tax
16 transcript requests are going to get responded to.

17 JUDGE GUTHRIDGE: And we talked about a
18 schedule for filing of briefs, at least the time
19 periods that would be necessary, but, Mr. Troiano,
20 as I recall, you wanted to wait until after the
21 tax form comes in to start the briefing period?

22 MR. TROIANO: Yes, can I back up? Mr.

1 Doumar, did you say tax transcripts were requested
2 or copies of the tax returns?

3 MR. DOUMAR: I think the actual tax --
4 referring to the file, I think the actual copies
5 of the tax returns were requested, but we should
6 check.

7 JUDGE GUTHRIDGE: What I wanted was the
8 tax return with the signatures and date.

9 MR. DOUMAR: I understand. I
10 understand, Your Honor. That was correct, right,
11 the 4506? But check, I think that's right.

12 MR. TROIANO: And can we get a date when
13 they were requested?

14 MR. DOUMAR: We'll check and get the
15 exact date to you.

16 JUDGE GUTHRIDGE: So other than that,
17 Mr. Troiano, you want to wait until that comes in
18 to start your briefing period?

19 MR. TROIANO: I think we have to. I
20 think we're entitled to, Your Honor.

21 JUDGE GUTHRIDGE: That's fine. All
22 right.

1 MR. DOUMAR: Appreciate Your Honor's
2 time.

3 JUDGE GUTHRIDGE: Is there anything else
4 then today? Anything anybody wants to bring up?
5 It's only 3:00.

6 MR. DOUMAR: No, I think that's fine,
7 Your Honor. I didn't intend to present extensive
8 testimony. Just wanted to give Ms. Ghanem a
9 chance to testify.

10 JUDGE GUTHRIDGE: All right. Thank you
11 for coming in, Ms. Ghanem.

12 MS. GHANEM: Thank you.

13 JUDGE GUTHRIDGE: All right. Anything
14 else, Mr. Troiano?

15 MR. TROIANO: We have nothing, Your
16 Honor.

17 JUDGE GUTHRIDGE: All right. The
18 hearing is adjourned.

19 MR. DOUMAR: Thank you, Your Honor.

20 (Whereupon, at 2:59 p.m., the
21 HEARING was adjourned.)

22 * * * * *

1 CERTIFICATE OF NOTARY PUBLIC

2 DISTRICT OF COLUMBIA

3 I, Carleton J. Anderson, III, notary
4 public in and for the District of Columbia, do
5 hereby certify that the forgoing PROCEEDING was
6 duly recorded and thereafter reduced to print under
7 my direction; that the witnesses were sworn to tell
8 the truth under penalty of perjury; that said
9 transcript is a true record of the testimony given
10 by witnesses; that I am neither counsel for,
11 related to, nor employed by any of the parties to
12 the action in which this proceeding was called;
13 and, furthermore, that I am not a relative or
14 employee of any attorney or counsel employed by the
15 parties hereto, nor financially or otherwise
16 interested in the outcome of this action.

17
18
19 (Signature and Seal on File)

20 -----
21 Notary Public, in and for the District of Columbia

22 My Commission Expires: March 31, 2017